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July 7, 1992

ORIGINAL
FILE

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 92-77, NPRM Released May 8, 1992, Billed Party Preference for 0+ InterLATA Calls

Enclosed are comments of the American Hotel & Motel Association to the above referenced Notice of Proposed Rulemaking by the Commission.

I certify that an original of these comments is being submitted, along with nine copies so that each Commissioner may have a personal copy. In addition, a further copy is being submitted for filing with the Dockets Reference Room (Room 230) of the Commission.

Any questions or comments regarding this filing can be directed to my attention at 202/289-3120.

Sincerely,

Brian Kinsella
Manager
Governmental Affairs

Enclosures

cc: Thomas Youngblood

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List A B C D E

Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of	)	
	)	
Billed Party Preference for 0+ InterLATA Calls	)	CC Docket No. 92-77
	)	

To: The Commission

Comments of the

American Hotel and Motel Association

1201 New York Ave., NW
Washington, DC 20005-3931

July 7, 1992

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Summary

The American Hotel & Motel Association ("AH&MA") believes that billed party preference ("BPP") as currently envisioned would be technologically regressive and harmful for consumers while simultaneously increasing costs for all. An astonishing array of telecommunications services are now available to the traveling public because of successful public policy predating divestiture. Features such as security through room-status monitoring, accelerated guest check-in, voice mail, facsimile and in-room computer data ports are just a few examples of capabilities, the maintenance and growth of which could be severely threatened under BPP.

AH&MA views BPP as anti-competitive and regionally monopolistic because it would recreate network bottlenecks and recentralize network intelligence, consequences that are regressive and antithetical to the rationale behind divestiture.

The full impact of TOCSIA and its accompanying regulations has yet to be fully assessed, yet the Commission is proceeding with another (and potentially much more costly) solution to many of the issues already addressed by TOCSIA. If the Commission still supports TOCSIA and its regulations, they should be given time to work. If the Commission is abandoning its past regulatory approach, it should do so explicitly. De facto 'billed party preference' already exists for the majority of callers. An estimated 87% of all operated-assisted calls originating from the lodging industry are carried by MCI, Sprint and AT&T—OSPs for which there appear to be few consumer complaints. BPP presents an expensive, unwieldy and unnecessary solution in search of rapidly diminishing problems in the remaining 13% of 0+ traffic.

If the Commission determines that some form of BPP is in the public interest, then AH&MA requests the following: relief from the existing 10XXX unblocking burdens; explicit assignment of BPP toll fraud away from aggregators; the expansion of Commission-ordered compensation for operated assisted calls (both access-code calls and any derivative under BPP) to include *all* aggregator phones (not just payphones); and, no new CPE requirements for storage and transmission of certain caller information.

AH&MA asks the Commission to consider these comments on behalf of the single-largest aggregator of non-domestic telephone traffic: the lodging industry, with a conservatively estimated 3 million in-room phones and thousands of on-premises payphones.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
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To: The Commission

Comments of the

American Hotel and Motel Association

Introduction

The American Hotel & Motel Association ("AH&MA") submits comments in the above-captioned Notice of Proposed Rulemaking ("NPRM"), FCC Docket No. 92-77. AH&MA represents some 10,000 individual lodging properties across the U.S., the District of Columbia, Puerto Rico and the Virgin Islands. These 10,000 properties account for approximately 1.4 million rentable rooms and about 82% of the $63 billion in annual industry revenues. There are an estimated total of 3.1 million transient rooms in the U.S.; this includes everything from a seasonal condominium community (e.g., units rented during ski season), traditional hotels and motels, to a bed and breakfast. Assuming most guest rooms have at least one telephone (many have two or more), the lodging industry would conservatively account for 3 million in-room telephones. This is on top of the thousands of public payphones found in hotels. As the largest single "aggregator"[1] of non-domestic

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1/ As currently defined in P.L. 101-435, the Telephone Operator Consumer Services Improvement Act of 1991 ("TOCSIA")

telephone traffic in the country, AH&MA asks that the Commission take this fact into account when considering any action in this Docket.

I. The Commission is considering ordering a costly and technically problematic access scheme of Billed Party Preference ("BPP") long before the impact of actions already undertaken under TOCSIA, which have imposed costs and tremendous administrative burdens on aggregators, are fully assessed.

A. TOCSIA and its regulatory scheme should be given time to work.

The Commission appears to partially justify this Docket's action on BPP based on issues raised under Dockets 90-313 and 91-35. Consumer frustration with 0+[1] dialing has centered mainly around charges that appear to be unjust and unreasonable, incurred because of unexpected results when dialing in the public domain (0+)—unexpected and unknown OSP billings for example. Action already completed in these other dockets has already remedied, at least in theory, confused consumer expectations when it comes to choice in long-distance services, and the availability of market information.

AH&MA believes that the impact of the combination of recent market forces coupled with TOCSIA's implementation is far from being fully accessed. Action on BPP may be premature. Current law and regulation should be given time to take hold. In particular, AH&MA would ask the Commission to hold off on any order requiring BPP pending any additional actions TOCSIA may require the Commission to take (e.g., ensuring that OSP rates are just and reasonable) according to the time frame called for in the law. Additional time should also be allowed after any possible additional Commission action subsequent to TOCSIA

1/ By "0+", we mean all 0+/0- dialing patterns, with or without access codes, unless otherwise specified

requirements in order to allow such requirements to take effect, and then be evaluated for efficacy.

B. Consumer convenience, market information, and specified choice of OSP (via 'universal' access codes available today), have already been addressed by TOCSIA and subsequent Commission rulings, and will be implemented far more rapidly and less expensively than BPP.

Almost all aggregator phones now allow some form of access code dialing; the Commission's own findings show that as of September of 1991, 97% of all surveyed phones had unblocked 800, and 83% unblocked 950.[1] The Commission readily acknowledges (NPRM ¶8) that as a result of TOCSIA and subsequent Commission actions, callers should be able to reach their OSP of choice from any aggregator location. Thusly, since the "billed party" is arguably the caller in 80% of 0+ calls (according to AT&T, NPRM at p. 8), and since universal access is *now* available via 800 and 950, the only benefit of BPP to consumers would be the convenience of dropping the requirement for dialing access codes. While the codes widely available now at aggregator locations are 7 or 11 digits in length, the Commission has ordered absolute unblocking of 10XXX codes by 1997. So by 1997, the immense costs and potential technological limitations associated with BPP (to be discussed later) might have been undertaken to save calling card customers a total of five digits.

The Commission's caveat "provided that they remember their carrier's access code and are willing and able to dial it" does not dissipate under BPP. The caller must still "remember" a code—their calling card (in one of several formats). There is now no inability to dial an access code because of blocking, as it has been unlawful to block 800 or 950 since January of 1991 (under TOCSIA), and 10XXX

1/ *Interim Report of the Federal Communications Commission Pursuant to the Telephone Operator Consumer Services Improvement Act of 1990*, Nov. 14, 1991, at p. 16

access (a 'more convenient' access code) is proceeding according to the Commission six-year timetable.

AH&MA believes that if consumers were to be fully informed of their increased overall telephone costs (to be better determined under this docket) under BPP, they would choose to dial access codes to avoid unnecessary cost increases. Furthermore, the majority of Americans do not hold calling cards. AH&MA believes that the average U.S. telephone rate payer should not be forced to subsidize the implementation of BPP (and certainly would not *choose* to do so) for the disputed convenience of a minority of calling card customers.

C. De facto 'billed party preference' already exists for the majority of callers.

Today, most consumers enjoy de facto 'billed party preference' via 800 and 950 access codes. While BPP proponents may argue that it is inconvenient to dial seven (or eleven) digits to access a preferred IXC, 800/950 nonetheless works today, is readily understood by consumers, and allows access to the caller's preferred carrier (which in 80% of all operator assisted calls *is* the billed party[1]). The 'billed party's' preferred IXC could still be specified in the 20% or so of access code calls (bill-to-third-number and collect) by dialing the access code of the billed party's preferred carrier. Even though universal 10XXX access does not yet exist (the Commission's preferred standard), it must not lose sight of the fact that full consumer choice exists today because of past Commission action.

II. Under BPP, the need for all other access codes is obviated. If BPP is implemented, then relieve aggregators from the existing burdens of unblocking 10XXX.

BPP could be implemented before conclusion of the 10XXX unblocking timetable set forth in CC Docket 91-35 (with a final deadline of 1997). If

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1/ According to AT&T, NPRM at p. 8

implemented without some form of mandated access code origination compensation (discussed later), BPP would dry up the offsetting revenue streams long used to justify existing installations, much less eliminate funding to make new equipment purchases mandated by the Commission's 10XXX unblocking schedule.

AH&MA questions BPP proponents' claims of increased consumer convenience and "user-friendliness" under the environment described in the NPRM. Instead of three potential access methods: 800, 950 and 10XXX, a fourth is being considered—BPP. Even though proponents and the Commission presuppose otherwise, BPP would eliminate the need for all other 0+ access methods (800, 950 and 10XXX). Eliminating access-codes with the implementation of universal BPP *would* achieve the Commission's goal of "user-friendliness." Their simultaneous existence would throw the existing state of confusion into higher orbit. If BPP is determined by the Commission to be in the public interest, resources currently being allocated to provide 10XXX and 800/950 access would be better redirected towards BPP.

On the other hand, AT&T has spent millions over the years educating its customers to use 10288. MCI and Sprint have always relied on their proprietary access codes via 800 and 950. There is no doubt that the volume of access-code calls will continue to grow as consumers become better educated under the existing environment. Large volumes of access code calls present a major stumbling block in reconfiguring LEC and IXC networks to accommodate both access code calls and BPP routing. Where will the funding come from to pay for BPP if a preponderance of 0+ calls are being routed via access codes?

III. If BPP is implemented, 0+ toll fraud is naturally assigned to LECs and IXCs.

With the recentralization of network intelligence called for under BPP, aggregators will be giving up control of 0+ calls (public domain 0+, without access

codes) originating from their lines. Loss of this control must also be accompanied by an explicit transfer of liability for toll fraud. Because all routing, validation and billing for BPP calls will be handled by LECs and IXCs, aggregators would not normally be billed for BPP calls, and therefore should *never* be billed for these calls from the premises.

In addition, AH&MA would ask the Commission to consider the broader topic of toll fraud, which has recently been the subject of a Congressional hearing and proposed legislation. Toll fraud associated with the 10XXX access code, and other types of fraud (e.g. pay-per-call services billing the originating line based on 800 access), is a continuing and growing problem that should be addressed in this proceeding.

IV. BPP would be technologically regressive and harmful for consumers while simultaneously increasing costs for all.

A. The explosion in important telecommunications technology offerings to the traveling public since divestiture would halt and retreat under a BPP environment.

The explosive growth in telecommunications services for the traveling public is a major success story of divestiture. Investments in CPE and telecommunications services in the lodging industry have been based on long-standing public policy as determined by the Commission and the courts. In 1981, the Commission determined that hotels and motels may resell telephone services so that the *users* of telephone services would be paying for the privilege and convenience of making calls from guest rooms, and non-users would no longer have to subsidize phone services.[1] Prior to this time, in-room telephone services were generally provided for at a net loss, and telephone costs were built into the room

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1/ FCC Docket 80-54, *Regulatory Policies Concerning Resale and Shared Use of Common Carrier Domestic Public Switched Network Services*

rate. Divestiture was ordered, *inter alia*, to decentralize the 'intelligence' in the public-switched network. With the abilities to resell telephone services and place 'intelligence' on site (through CPE), coupled with divestiture, the lodging industry continues to offer an expansive array of telecommunications services to the traveling public.

BPP would impair current and evolving technology in two ways: it would (unless some other compensation scheme was mandated) eliminate the modest and long counted-on compensation for the origination of operated-assisted traffic—a vital revenue source in funding investments in telecommunications technology—and, BPP would present some purely technical roadblocks to current and future technology offerings.

Individual hotels and hotel chains compete on the basis of telecommunications service offerings, offerings which require tremendous CPE investments. For example, the New York Hilton and Towers announced in October of 1991 the availability of voice mail, computer data ports, and single-touch buttons for guest services, with the installation of its new telephone system. (See **Attachment A**, New York Hilton press release *"The New York Hilton and Towers Installs New Multi-Million Dollar Telephone System"*).

Our country's long list of currently-available on-premises telecommunications services offered the traveling public is unparalleled anywhere in the world. Those who conceived divestiture would now be proud to see the following capabilities:

- ☎ *Increased security through room-status monitoring*
- ☎ *Increased security through internal alarm signaling with guest dialing of '911'*
- ☎ *Accelerated guest access to rooms upon check-in through housekeeping automated reporting of room availability*
- ☎ *Automatic guest identification (an on-screen automated display of guest name and room number used at service stations—such as room service—to*

allow staff to address guest by name. Achieved via an interface with the property management system)

- *Voice mail*
- *Facsimile and in-room facsimile*
- *In-room computer data ports*
- *Last number redial*
- *Speaker phones*
- *Call waiting*
- *Multiple lines and multiple phone sets per room*
- *Conference calling*
- *Speed dial (one-touch buttons for guest services)*
- *Automated concierge via audiotext*
- *Interactive voice response*
- *Answer detection (ensures call completion before billing)*
- *Portable phones*
- *Automated message delivery*
- *Bedside control of room air conditioning and heating, room lights and television*
- *Integrated voice and data networks, both Local Area Networks (LANs) and Wide Area Networks (WANs). LANs integrated through PBX for interconnecting point-of-sale terminals with administrative computers; WANs for chain-wide communications of central reservations and operating data*

Add to the above list evolving technologies such as deployment of nation-wide ISDN services, enabling video conferencing for example; the creation of chain-wide software defined networks (SDNs); and direct digital connections to IXCs via T-1 trunks. BPP would have both direct and indirect negative impacts on the availability and evolution of on premises telecommunications technologies. It would directly hamstring choices in the interconnect market by forcing LEC routing of all 0+ calls, and BPP would eliminate all incentive to continue to expand telecom services by eliminating revenues.

The growth in T-1 connections to hotels serves as a good example of a new cost-savings and service-enhancing technology that could be arrested by BPP. T-1

trunking allows the direct connection of a hotel's 1+ and 0+ traffic to the presubscribed IXC via a broadband digital connection (know generically as LEC 'bypass'). T-1 connections provide 24 two-way digital voice channels when connected to a digital PBX providing the following benefits: crystal-clear connections (it's an all-digital pipe); extremely fast call set up times (since a call is routed directly to the IXC); substantially lower unit costs; greatly increased bandwidth in a convenient and cost efficient package which allows, for example, simultaneous voice and data connections; and increased central control and management of wide-area telecom systems (within a hotel chain for example).

BPP would eliminate any form of LEC bypass for 0+ traffic. It would increase call setup times for 0+ calls otherwise routed via T-1s. T-1 connections are presently cost-justified by combining 1+ and 0+ traffic. Elimination of these connections alone would severely impair current and future technology. While BPP may seem at first to be an enabling new technology for consumers, it actually presents many possible impediments to technological innovation by recentralization of network intelligence.

B. BPP would be anti-competitive.

BPP could be anti-competitive for the following reasons: it would dry up the competitive payphone market; raise the barriers of entry to competitive OSPs; and reconcentrate monopolistic power back at the LEC level. Clearly competition in these areas has benefited aggregators and consumers. The LEC level of service in pay telephones has increased markedly since competition was introduced. AT&T has substantially enhanced its OSP service offerings, increased quality, and has provided many other consumer benefits in the face of heated competition. Divestiture has worked to create innovative new services while allowing market forces to work its magic on the former monopoly service provider.

Hotels are reliant on the network and on technology vendors for phone services. Our guests aren't mad at 'the phone company' when something goes wrong with a telephone call (as more than amply demonstrated in CC Docket 91-35). No matter what happens, we're left holding the bills and the bag, and the risk of losing business from dissatisfied customers. We currently experience enough challenges in working with telcos with existing issues, both RBOCs and independents, in addressing our very specialized industry needs. Recentralizing IXC traffic routing through LECs creates further bottlenecks and eliminates the network redundancies that have naturally begun to emerge. Hotels, hospitals, universities, and other aggregators, are also consumers of telecommunications services. As consumers, aggregators have every right to be wary of any Commission action which could lead to the erosion of competitive offerings and reconcentrate traffic. Competition, innovation, and freedom of choice are all underpinnings of the MFJ.

V. If BPP is implemented, include all aggregator phones in a per-call compensation mechanism similar to that under development for competitive payphone providers.

A. The Commission recognizes that access code calls should be compensated.

The Commission has recognized the principle of compensating payphone operators for access code calls. It has ordered interim compensation in the amount of $6 per payphone per month for access code calls on a prorated basis from OSPs earning toll revenues in excess of $100 million per year[1]. At the 4/9/92 adoption meeting, the Commission's rationale behind ordering interim compensation was to provide a strong incentive for the network service providers affected to develop a per-call compensation mechanism. The Commission contemplates the expansion of

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1/ Codified at 47 CFR 64.1301

access-code compensation to include all operator-assisted calls (NPRM ¶28). Since TOCSIA and the Commission have lumped payphones together with other telephones offered to the traveling public as "public phones", and since it has recognized that the originators of interstate access-code calls are entitled to some means of compensation (see NPRM at ¶28), AH&MA requests that an equitable compensation mechanism also be developed (and any derivative under a BPP environment) for the other so-called public phones, e.g., *all* aggregator phones.

B. Call origination compensation under BPP would continue long-standing public policy.

The basis of over ten years worth of investments made to increase technology offerings to consumers would be shattered under BPP without some form of mandatory origination compensation.

It is no surprise to observe that 1+ traffic in the lodging industry is gradually migrating to 0+ calling-card traffic. A recent examination of a call detail report of a chain-affiliated business hotel revealed that almost 70% of all interstate calls from guest rooms were dialed either 0+, 800 or 950. Commission-ordered call origination compensation for *all* aggregators under BPP would ensure that aggregators are evenly compensated for their role in originating operator-assisted calls. AH&MA fully expects an increasing number of guest calls to be access-code calls as consumers become increasingly educated under the present requirements. The revenue streams long counted on to offset substantial equipment costs are rapidly diminishing. Taken to its logical conclusion, either some other appropriate revenue stream that is user-specific must be generated, or telecommunications service offerings by aggregators will wither.

C. Consumers have complained about unjust and unreasonable charges, not about commissions.

The problem for consumers is not the existence of OSP compensation to aggregators for call origination *per se*, because origination compensation for operator assisted calls has been a part of the U.S. telecommunications system since long before divestiture (15% under the old Bell System). Consumers have not complained about commissions per se, they have complained about charges that appear to be "unjust" and "unreasonable"—in particular, charges that are noticeably higher than those of the dominant carrier and its biggest competitors. Indeed, in it's "Interim Report,"[1] the Commission found that the "vast majority of OSPs charge rates that are significantly higher than AT&T's rates." It has directed the OSPs that charge the highest rates to demonstrate that their rates are just and reasonable[2]. The combined market share of these other carriers is almost nominal (estimated at 8%). We presume that the carriers so identified are *not* the three largest: AT&T, MCI and Sprint. Yet these three carriers compensate aggregators for originating 0+ calls, and the vast majority of hotels are presubscribed to these largest carriers.

Nineteen of the top twenty lodging chains have presubscribed their 0+ traffic to AT&T. At the individual locations of these chains falling under the national agreements, consumer access and consumer rate expectations are clearly not a problem. The modest per-call origination compensation derived from these service arrangements with AT&T continue to provide the returns necessary to justify existing investments and reinvestment in telecommunications services for the guests of these chains. In addition, AT&T's market share of 0+ call volume in today's lodging industry is conservatively estimated at 75%; MCI has about 7%,

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1/ *Interim Report of the Federal Communications Commission Pursuant to the Telephone Operator Consumer Services Improvement Act of 1990*, Nov. 14, 1991, at p. 1

2/ I.D.

and Sprint holds approximately 5%. The remaining 0+ traffic is handled either by automated attendant ("bong-in-a-box"), estimated at 5%, or other OSPs, estimated at 8%. Clearly, the vast majority (87%) of 0+ calls originated from the lodging industry are carried by the "big three:" AT&T, MCI and Sprint. These are operator service providers for which there appear to be few consumer complaints of the type that forced action under the TOCSIA.

The above picture of 0+ presubscription in *today's* lodging market (not the market of over three years ago when Congress initiated action on TOCSIA) shows that the vast majority of lodging locations are looking to strike a balance of reasonable telephone rates for consumers and modest returns on telecommunications investments. The vast majority of hotels working with the 'big three' have been able to provide guests the service and rates that they expect, and provide enough return revenues to justify current and prospective telephone services. As a matter of fact, it can be argued that the users of OSPs charging the highest rates commented on in the Commission's Interim Report[1] are not necessarily justifying these higher consumer charges for reinvestment, but rather for the type of straight profiteering that has been rightly criticized. While this has unfortunately tarnished the image of the entire industry, AH&MA feels that just and reasonable rates coupled with just and reasonable reinvestment have worked to the mutual benefit of the traveling public and the lodging industry and should continue.

1/ *Interim Report of the Federal Communications Commission Pursuant to the Telephone Operator Consumer Services Improvement Act of 1990*, Nov. 14, 1991

VI. The Commission should not order the upgrading or installation of CPE to perform storage and transmission of caller information under BPP.

The Commission considers (NPRM ¶26) the possible availability of CPE that could perform store and forward functionality to avoid forcing callers to provide certain information twice. With regard to CPE, this is a disturbing proposition.

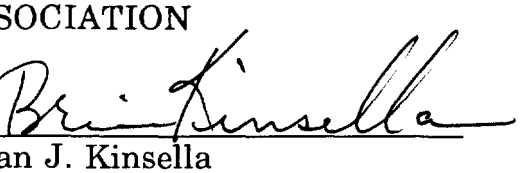
TOCSIA mandated CPE manufactured or imported after April of 1992 to selectively process 10XXX. (We question full compliance by all PBX manufacturers, particularly when it comes to international direct-dialed access-code sequences.) The Commission has just ordered aggregator CPE to be upgraded to provide 10XXX dialing capability at much difficulty and expense (CC Docket 91-35). BPP would overturn well over ten years of precedent in hotel call-origination compensation, over eight years of network decentralization precedent under the MFJ, would require ratepayers, network service providers and aggregators to pay LECs for its implementation (via various transaction fees). The NPRM then further considers forcing aggregators to *again* modify CPE to help BPP get off the ground (at unknown administrative difficulty and expense). We would ask the Commission to cease further consideration at this time of more CPE upgrades at aggregator expense.

Conclusion

AH&MA suggests that many of the consumers goals outlined in this NPRM have already been addressed in prior proceedings; TOCSIA and its subsequent regulations should be given time to take effect. However, if the Commission determines that some form of BPP is in the public interest, then AH&MA respectfully requests that concerns raised herein be considered on behalf of some 3 million telephones with a vast array of services offered to the traveling public. The Commission should not throw the pro-consumer, pro-technology baby born from divestiture out with the now contained bath water of frustrated consumer expectations.

Respectfully submitted,

AMERICAN HOTEL & MOTEL ASSOCIATION

by: 

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July 7, 1992

ATTACHMENT A

Contact: Lola Preiss
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THE NEW YORK HILTON
AND *Towers*
AT ROCKEFELLER CENTER

THE NEW YORK HILTON AND TOWERS INSTALLS NEW MULTI-MILLION DOLLAR TELEPHONE SYSTEM

The New York Hilton and Towers has just completed the installation of a new multi-million dollar telephone system to provide better and more efficient service to its guests. This is the largest hotel phone system with electronic voice mail ever installed by Northern Telecom, and the new system is described as the biggest and the best.

The major components of the new system are voice mail, computer dataports in every guest room, and single touch buttons for guest services. Voice mail enables guests to hear their messages exactly as the caller spoke them, from within the hotel, from outside the hotel, and even after checkout. Guests also can leave a personal greeting for callers. Voice mail is the equivalent of each guest having their own answering machine in their guest room. International guests, who represent approximately one-third of the hotel's business, can now receive and leave messages in any language without error or confusion. In addition, every voice message is automatically time and date recorded.

If a caller prefers to leave a written message, they have the option of being connected to the operator from the voice mail system. Whether the message is by voice or written, guest notification is immediate with the flashing red light on the guest room telephone being lit. Also, any employee with access to a terminal can advise a guest if they have a message and connect them to their voice mailbox. Guests also can leave messages with the hotel operator to be given to callers.

(more)

Business Travel

For the business traveler there is a dataport in every guest room for a computer, fax, or modem. Every guest room also has two telephones, one on the desk and one on the bedside table. Hotel services are reached by touching only one button rather than by dialing the numbers of an extension.

Executive Tower

In Executive Tower, the hotel's six floor hotel-within-a-hotel, the new system provides enhanced services, including two telephone lines with a hold button, and a speaker phone feature on the desk telephone. The large, luxurious master suites, often used for entertaining or hospitality, have a dedicated line with modular jack permanently installed, which can be used for computer, fax or modem, separate from the telephone lines and dataport, or for another direct dial telephone which would bypass the hotel switchboard.

Other Features

There are many other features which provide more and better guest service. Maids dial a code to advise the front office that a room has been cleaned and is available for sale. With this new technology, billing is more accurate because the hotel receives exact billing information from the telephone company, eliminating erroneous billing for uncompleted calls. Wake-up service is also part of the new system, and it is possible for every guest in the hotel to be automatically awakened within a 15 minute span. Guests also can program their own wake-up calls from their room.

Two full-time telephone technicians are on the premises, one BellSouth staff person and one New York Hilton employee, to provide immediate service for telephone installation or for telephone problems.

(more)

Northern Telecom provided the hardware and the software. After extensive meetings with hotel management, BellSouth designed the system to meet the specific needs of The New York Hilton and Towers.

Meetings and Exhibits

The extensive system of telephone lines installed in Americas Hall, the hotel's new exhibit space, would enable a city-wide convention to move the heart of its operations into the hotel. With this new system the hotel also can be more responsive to the telephone needs of meeting planners, even on short notice.

The New York Hilton and Towers is the largest hotel in New York, with 1,805 guest rooms and suites in the hotel and another 237 guest rooms and suites in the private Executive Tower. The hotel has the largest Grand Ballroom in New York, and with the new Americas Hall is the city's largest hotel convention and exhibition center.

Conveniently located at Rockefeller Center in midtown Manhattan, the hotel is one block from Fifth Avenue and its famous shops, within walking distance of restaurants, nightspots, and sightseeing attractions. The New York Hilton is near Broadway theaters, down the street from Radio City Music Hall, and surrounded by business headquarters and media centers.

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